

**EASTERN DISTRICT OF NEW YORK**

JEANETTE MINONDO, individually and on  
behalf of all others similarly situated,

*Plaintiff,*

v.

B&G FOODS, INC.,

*Defendant.*

**Case No: 1:23-cv-08087-TAM**

**JOINT STATUS REPORT**

Plaintiff Jeanette Minondo (“Plaintiff”) and Defendant B&G Foods, Inc. (“Defendant”) jointly submit this status report pursuant to the Court’s text order entered on February 29, 2024.

**I. Plaintiff’s Report**

To date, the parties have exchanged written discovery and provided responses. Plaintiff is preparing a 30(b)6 deposition notice. Otherwise, discovery is ongoing. Plaintiff would propose the following schedule regarding remaining deadlines:

<b>Event</b>	<b>Plaintiffs’ Proposal</b>
Deadline to Complete Written Discovery	December 15, 2024
Deadline to Conduct Depositions	February 14, 2025
Deadline for Plaintiffs to File Motion for Class Certification & Expert Reports	March 28, 2025
Deadline for Opposition to Plaintiffs’ Motion for Class Certification & Expert Reports	April 18, 2025

Deadline for Plaintiffs to File Reply in Support of Class Certification	May 9, 2025
Last Day for Parties to Exchange Rule 26(a)(2) Initial Expert Disclosures	90 days after ruling on class certification
Last Day for Parties to Exchange Rule 26(a)(2) Counter Expert Designations	120 days after ruling on class certification
Last Day to Complete Expert Depositions & Document Production	150 days after ruling on class certification
Deadline to File Dispositive Motions	30 days after completion of expert discovery
Pre-Trial Conference	30 days after ruling on dispositive motions

## II. B&G Foods' Report

In this case, Plaintiff claims that the tiny print on the back of a label of pasta sauce saying “no artificial preservatives” caused her to buy pasta sauce, instead of the myriad other reasons people actually buy pasta sauce, like taste or price.

Since filing her claim, Plaintiff has abandoned it. On April 22, 2024, Plaintiff failed to appear for her duly noticed deposition. Plaintiff also ignored B&G Foods’s requests to meet and confer about when Plaintiff would be available for her deposition. Plaintiff further served only objections to B&G Foods’s March 22, 2024, written discovery requests.

Unless and until Plaintiff decides to resume prosecuting her case, B&G Foods should not be compelled to incur the burden and expense of discovery.

Should Plaintiff appear for her deposition, B&G Foods proposes the following schedule:

Event	B&G Foods' Proposal
Deadline to Complete Written Discovery	120 days after Plaintiff appears for her deposition

Deadline to Conduct Depositions	180 days after Plaintiff appears for her deposition
Deadline for Plaintiffs to File Motion for Class Certification & Expert Reports	225 days after Plaintiff appears for her deposition March 28, 2025
Deadline for Opposition to Plaintiffs' Motion for Class Certification & Expert Reports	255 days after Plaintiff appears for her deposition
Deadline for Plaintiffs to File Reply in Support of Class Certification	285 days after Plaintiff appears for her deposition
Last Day for Parties to Exchange Rule 26(a)(2) Initial Expert Disclosures	120 days after ruling on class certification
Last Day for Parties to Exchange Rule 26(a)(2) Counter Expert Designations	150 days after ruling on class certification
Last Day to Complete Expert Depositions & Document Production	180 days after ruling on class certification
Deadline to File Dispositive Motions	90 days after completion of expert discovery
Pre-Trial Conference	90 days after ruling on dispositive motions

September 9, 2024

Respectfully submitted,

/s/ Julian C. Diamon

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September 9, 2024

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